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FILED
HARRISBURG, PA

FEB 11 2002

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

MARY E. D'AMOREA, CLERK
Per gls

LINDA F. WEABER,
Plaintiff

v.

HERSHEY FOODS CORP.,
Defendant

CIVIL ACTION NO. 1:CV-01-0856

J. Rambo

JURY TRIAL DEMANDED

JOINT MOTION FOR EXTENSION OF TIME FOR DISCOVERY

The parties, by and through their undersigned counsel, herein jointly move the Court to modify the October 23, 2001 Case Management Order, most particularly the March 15, 2002 deadline for discovery. In support thereof, the parties state as follows:

1. Plaintiff filed her Complaint alleging various forms of employment discrimination and other employment-related claims on May 15, 2001.
2. Defendant filed its timely Answer to Complaint on August 28, 2001.
3. On October 23, 2001, this Court entered its Case Management Order which, among other things, set the discovery deadline for March 15, 2002.
4. On November 30, 2001, Defendant propounded its First Set of Interrogatories and First Request for Production of Documents to Plaintiff.
5. Plaintiff's responses were due on or before January 3, 2002.

6. To date, Plaintiff has not responded to Defendant's initial discovery requests. Plaintiff had drafted her responses and indicates that she had forwarded them to Counsel for review and evaluation; however, Counsel did not receive the responses drafted by Plaintiff and now, must reconstruct those responses to forward to Defendant.

7. In anticipation of timely receipt of responses to the initial discovery, Defendant initially noticed Plaintiff's deposition for January 21, 2002. After further discussion between counsel, and in anticipation of subsequent receipt of Plaintiff's responses to Defendant's initial discovery, the deposition was rescheduled for Friday, February 22, 2002.

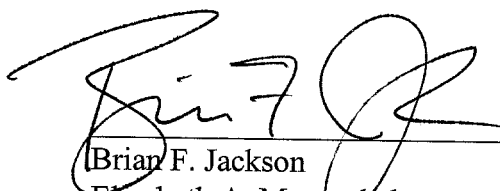
8. Plaintiff's counsel also has tentatively scheduled the deposition of certain Company representatives for the week of March 4, 2002.

9. Plaintiff's counsel has indicated that he may seek to take the depositions of a former employee of Defendant as well as a corporate designee.

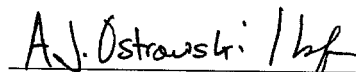
10. The parties believe that extending the discovery period by an additional 30 days will better permit the full completion of outstanding discovery and any additional necessary discovery which may result from Plaintiff's deposition and other depositions.

WHEREFORE, the parties respectfully request that this Court modify its Case Management Order by *inter alia* modifying the discovery deadline from March 15, 2002 to April 15, 2002, the dispositive motion and supporting brief deadline of April 1, 2002 to April 30, 2002 as well as any other changes which the Court may deem fit.

Respectfully submitted,



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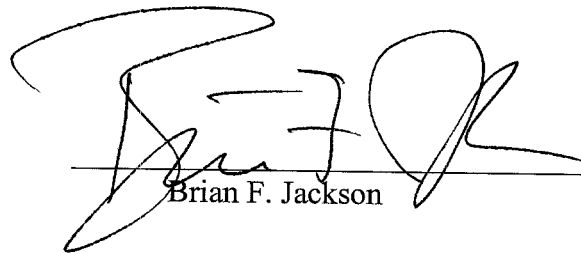
Andrew J. Ostrowski, Esquire
4311 North Sixth Street
Harrisburg, PA 17110
Attorney for Plaintiff

Dated: February 11, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing document, by first-class United States Mail, postage prepaid, upon the following:

Andrew J. Ostrowski, Esquire
4311 North Sixth Street
Harrisburg, PA 17110



Brian F. Jackson

Date: February 11, 2002